



ENZYMATIC THERAPY INCORPORATED

What **Better** feels like.™

INTEGRATIVE THERAPEUTICS INC.™

NF Formulas • PhytoPharmica
Tyler Encapsulations • Vitaline Formulas

9755 SW Commerce Circle, Suite B2

Wilsonville, OR 97070

P: 503.582.8386 • F: 503.582.0467

ENZYMATIC THERAPY™

&
PHYTOPHARMICA™

825 Challenger Drive, Green Bay, WI 54311-8328

P: 920.469.1313 • F: 888.570.6460 (Enzymatic)

P: 920.469.9099 • F: 920.469.4418 (Phyto)

May 11, 2005

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
NutriVitamin Enzyme Complex™ with Iron	Multivitamin and Mineral complex formulated for maximum absorption*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids, Palmitate), Vitamin C (from Poly-Ascorbate™), Vitamin D (as Cholecalciferol), Vitamin E (as d-Alpha-Tocopheryl Succinate), Vitamin K (as Phytonadione), Thiamine (as Thiamin Hydrochloride), Riboflavin (as Riboflavin 12.6 mg, Riboflavin-5'-Phosphate 5.1 mg), Niacin (as Niacinol™), Vitamin B6 (as Pyridoxine HCl 37.5 mg, Pyridoxal-5'-Phosphate 5.1 mg), Folic Acid, Vitamin B12 (as Cyanocobalamin), Biotin, Pantothenic Acid (as Calcium Pantothenate), Calcium (as Calcium Citrate, Malate, Ascorbate), Iron (as Iron Aspartate), Magnesium (as Magnesium Citrate, Ascorbate), Zinc (as Zinc Picolinate, Ascorbate), Selenium (as a Selenium Aspartate Complex), Copper (as Copper Aspartate), Manganese (as Manganese Aspartate), Manganese (as Manganese Aspartate), Chromium (from GlucoChrome™), Molybdenum (as Molybdenum Aspartate), Potassium (as Potassium Citrate, Ascorbate), Plant Enzymes – Amylase, Protease, Lactase, Lipase, Maltase (Malt Diastase), Sucrase (Invertase), Cellulase, Citrus Bioflavonoids complex, Choline (as Choline Bitartrate), Inositol, Gamma-Oryzanol, Rutin, Pro-Flora™, Lactobacillus rhamnosus, Bifidobacterium bifidum, Lactobacillus acidophilus, Enterococcus faecium, Bifidobacterium infantis, Bifidobacterium longum, Lactobacillus

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LET

16195

NutriVitamin Enzyme Complex with Iron 1c

		bulgaricus, lactobacillus plantarum, L-Glutathione, Reduced, Boron (as Boron Aspartate), Vanadium (as Vanadium Aspartate)
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I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: 

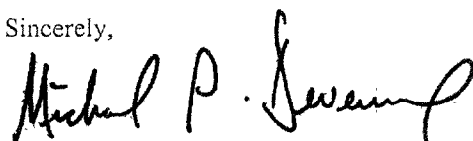
Robert C. Doster

Title: Senior Vice President of Scientific Affairs

Date 5-11-05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,



Michael P. Devereux
Chief Financial Officer



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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
NutriVitamin Enzyme Complex™ with Iron	NutriVitamin Enzyme Complex is an exclusive multivitamin and mineral supplement with highly concentrated, synergistic plant enzymes for optimal nutritional maintenance.*	Vitamin A (as Natural Beta-Carotene with Mixed Carotenoids, Palmitate), Vitamin C (from Poly-Ascorbate™), Vitamin D (as Cholecalciferol), Vitamin E (as d-Alpha-Tocopheryl Succinate), Vitamin K (as Phytonadione), Thiamine (as Thiamin Hydrochloride), Riboflavin (as Riboflavin 12.6 mg, Riboflavin-5'-Phosphate 5.1 mg), Niacin (as Niacinol™), Vitamin B6 (as Pyridoxine HCl 37.5 mg, Pyridoxal-5'-Phosphate 5.1 mg), Folic Acid, Vitamin B12 (as Cyanocobalamin), Biotin, Pantothenic Acid (as Calcium Pantothenate), Calcium (as Calcium Citrate, Malate, Ascorbate), Iron (as Iron Aspartate), Magnesium (as Magnesium Citrate, Ascorbate), Zinc (as Zinc Picolinate, Ascorbate), Selenium (as a Selenium Aspartate Complex), Copper (as Copper Aspartate), Manganese (as Manganese Aspartate), Manganese (as Manganese Aspartate), Chromium (from GlucoChrome™), Molybdenum (as Molybdenum Aspartate), Potassium (as Potassium Citrate, Ascorbate), Plant Enzymes – Amylase, Protease, Lactase, Lipase, Maltase (Malt Diastase), Sucrase (Invertase), Cellulase, Citrus Bioflavonoids complex, Choline (as Choline Bitartrate), Inositol, Gamma-Oryzanol, Rutin, Pro-Flora™, Lactobacillus rhamnosus, Bifidobacterium bifidum, Lactobacillus acidophilus, Enterococcus faecium, Bifidobacterium infantis, Bifidobacterium longum, Lactobacillus

		bulgaricus, lactobacillus plantarum, L-Glutathioine, Reduced, Boron (as Boron Aspartate), Vanadium (as Vanadium Aspartate)
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By: 
Robert C. Doster
Title: Senior Vice President of Scientific Affairs

Date 5-11-05

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Sincerely,


Michael P. Devereux
Chief Financial Officer